

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No: 08 CR 487
)	
v.)	
)	Judge Elaine E. Bucklo,
JESUS GONZALEZ,)	
)	
Defendant.)	

EMERGENCY AGREED MOTION TO AUTHORIZE TRAVEL

NOW COMES the Defendant, Jesus Gonzalez, by undersigned counsel and seeks an Order of this Court authorizing enlargement of the current conditions of bond to permit travel to Mexico. In support thereof, the Defendant states the following:

1. Defendant is charged in the above captioned cause.
2. Defendant is currently on bond.
3. Defendant was previously authorized by this Court to travel to-and-from Peoria, Illinois to attend court in the District Court for the Central District of Illinois as well as to travel to Texas on previous occasions for family events.
4. Defendant seeks authorization to travel to Mexico for purposes of attending his mother's funeral services and assist the family thereafter.
5. Defendant seeks authorization of this Court to leave the Northern District of

Illinois and return within fourteen (14) days of entry of an Order authorizing same..

6. Pre-trial Officer Sabina Hurtado has advised that Defendant has been fully compliant with all the conditions of release no objection to the grant of this motion.

7. AUSA Erica Csicsila has advised that she has no objection to the grant of this motion.

WHEREFORE, the Defendant seeks authorization from this Court to travel to Mexico upon entry of an Order and return to the Northern District within fourteen (14) days.

Stephen E. Eberhardt
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Stephen E. Eberhardt, an Attorney, certify that on February 27, 2015, I served the attached document on the below listed parties pursuant to Fed.R.Crim.P.49, Fed.R.Civ.P 5, L.R. 5.5, and the General Order on Electronic Filing of the United States District Court for the Northern District of Illinois, Eastern Division.

/s/ Stephen E. Eberhardt
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